

June 29, 2015

**VIA ECF**

The Honorable Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1610  
New York, NY 10007-1312

Re: In re Credit Default Swaps Antitrust Litig., No. 13 MD 2476 (DLC)

Dear Judge Cote:

We represent the Plaintiff class in the above-captioned matter. We write to provide a status report to the Court regarding the voluntary withdrawal of Plaintiffs Unipension Fondsmæglerselskab A/S, Arkitekternes Pensionskasse, MP Pension - Pensionskassen for Magistre & Psykologer, and Pensionskassen for Jordbrugsakademikere & Dyrlæger (collectively, "Unipension") as ordered on June 16, 2015 (ECF No. 420). Counsel for Unipension joins in this submission.

Unipension is a named plaintiff in this litigation. As part of its discovery obligations, Unipension has provided initial disclosures, responded to interrogatories, and produced certain trading records, investment management agreements and other corporate documents. At Unipension's request, its administrator Nykredit Portefølje Administration A/S also produced certain electronic transactional data for the relevant time period. Unipension's CDS transactions occurred through a sub-fund EMD Invest F.M.B.A<sup>1</sup>, which itself delegated the actual process to an investment manager (PIMCO). Although Unipension initiated the process of collecting additional ESI documents from the Unipension entities as requested by Defendants in their Requests for Production of Documents, Unipension believes that it cannot collect such documents for production in these proceedings without violating applicable Danish privacy laws.

As a result, lead counsel have prepared a Stipulation for the voluntary withdrawal of Unipension pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and all parties agreed to Unipension's withdrawal. This Stipulation is signed by all parties and is attached hereto as Exhibit A. Upon review of this letter by the Court, Lead Counsel for Plaintiffs will file the Stipulation.

With Unipension's withdrawal, there will remain eight named plaintiffs including the Los Angeles County Employees Retirement Association and Salix Capital, all of whom are committed to the prosecution of these claims.

Plaintiffs and counsel for Unipension are available to discuss this issue with the Court at its convenience if it has any questions.

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<sup>1</sup> EMD Invest F.M.B.A is the actual counter-party in the CDS transactions at issue in the litigation and had assigned its claims to Unipension.

The Honorable Denise L. Cote

June 29, 2015

Respectfully submitted,

/s/ George S. Trevor

George S. Trevor

/s/ Jonathan Oblak

Jonathan Oblak

*Co-Lead Counsel for Plaintiff Class*

/s/ Azra Z. Mehdi

Azra Z. Mehdi

*Counsel for Unipension Fondsmæglerselskab A/S, Arkitekternes Pensionskasse, MP Pension - Pensionskassen for Magistre & Psykologer, and Pensionskassen for Jordbrugsakademikere & Dyrlæger*